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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

PETER VELASCO, *et al.*,
Plaintiffs,
v.
CHRYSLER GROUP LLC,
Defendant.

Case No. 2:13-cv-08080-DDP (VBKx)

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR ATTORNEY
FEES, COSTS, AND SERVICE
AWARDS**

Date: January 11, 2016
Time: 10:00 a.m.
Judge: Hon. Dean D. Pregerson
Courtroom: 3

1 **PLEASE TAKE NOTICE** that on January 11, 2016, at 10:00 a.m., or as soon
 2 thereafter as this matter may be heard, before the Honorable Dean D. Pregerson, in
 3 Courtroom 3, 312 North Spring Street, Los Angeles, California, Plaintiffs will and hereby
 4 do move for entry of an order awarding Plaintiffs' \$3,526,000 in attorney fees and
 5 \$109,735 in costs pursuant to Federal Rule of Civil Procedure 23(h), and approving an
 6 award of \$4,000 to each of the six class representatives. Plaintiffs may supplement their
 7 requests for costs, up to a maximum agreed amount of \$120,000, should they incur
 8 additional costs prior to the hearing. Plaintiffs' motion is based on this Notice of Motion
 9 and Motion; the accompanying Memorandum of Points and Authorities, supporting
 10 declarations of Eric H. Gibbs, Joshua Konecky, and David Stein, and Proposed Final
 11 Order and Judgment; and all other papers filed and proceedings had in this action.

12 Local Rule 7-3 does not apply to this motion because, although the parties agreed
 13 to the award of attorney fees, costs, and service award, the Court is required to conduct
 14 an independent review pursuant to Rule 23(h).

15 DATED: November 18, 2015

GIRARD GIBBS LLP

17 By: /s/ Eric H. Gibbs

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